

Roopal P. Luhana
CHAFFIN LUHANA LLP
600 Third Avenue, Floor 12
New York, NY 10016
Telephone: (888) 480-1123
luhana@chaffinluhana.com

Sarah R. London (SBN 267083)
GIRARD SHARP LLP
601 California St., Suite 1400
San Francisco, CA 94108
Telephone: (415) 981-4800
slondon@girardsharp.com

Rachel B. Abrams (SBN 209316)
PEIFFER WOLF CARR KANE
CONWAY & WISE, LLP
555 Montgomery Street, Suite 820
San Francisco, CA 94111
Telephone: (415) 426-5641
rabrams@peifferwolf.com

Co-Lead Counsel for Plaintiffs

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

**IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION**

Case No. 3:23-md-03084-CRB (LJC)

This Document Relates to:

STIPULATION REGARDING CERTAIN DOCUMENTS

ALL WAVE 1 BELLWETHER CASES

Judge: Hon. Charles R. Breyer
Courtroom: Courtroom 6-17th Floor

WHEREAS, on August 21, 2025, the MDL Plaintiffs deposed corporate representative Chad Dobbs on six specific deposition topics:

<u>Topic Number</u>	<u>Deposition Topic</u>
1	Your strategy to increase the number of Riders and Rides for 2018 to present.
2	Your reasoning and basis for using an independent contractor model and

<u>Topic Number</u>	<u>Deposition Topic</u>
	how use of that model affected sexual assault prevention.
3	All means You employ to incentivize Drivers, including incentives for Drivers to increase the total number of hours they drive, the times at which they drive, and the locations where they pick up Riders.
4	All means You employ to incentivize Your employees, managers, and agents to increase or maintain driver supply and/or driver supply hours, including but not limited to KPIs or similar metrics, compensation, incentive programs, quotas, rewards and equity.
5	All means You employ to incentivize Your employees, managers, and agents to increase or maintain driver supply and/or driver supply hours available during nights and weekends, including but not limited to KPIs or similar metrics, compensation, incentive programs, quotas, rewards and equity.
8	Uber's policies, practices, and procedures for recruiting Drivers in each of the Bellwether Regions. As part of this topic, the deponent(s) should be prepared to discuss: (a) incentives, campaigns, policies, or directives related to Driver recruitment in the two years prior to each time the Subject Drivers applied to drive with Uber; (b) incentives, campaigns, policies, or directives related to Driver Supply in the two years prior to each time the Subject Drivers applied to drive with Uber; (c) campaigns or Marketing targeted at the Bellwether Regions in the two years prior to each time the Subject Drivers applied to drive with Uber; (d) Uber's target quantity of Drivers for the Bellwether Regions in the two years prior to each time the Subject Drivers applied to drive with Uber.

WHEREAS, after more than seven hours of time on the record with the witness, the Parties disagreed as to whether any additional time remained with the witness or whether time had run out;

WHEREAS, in an effort to avoid burdening the Court with this dispute, counsel agreed to meet and confer in an attempt to reach a Stipulation regarding the set of 18 documents not used during the deposition that counsel represented would be used with the witness absent the parties' dispute about time;

THEREFORE, as a result of these meet and confer efforts, Uber and Plaintiffs stipulate that 18 documents listed below are authentic, true, and correct records kept in Uber's ordinary course of business. The parties further stipulate that Plaintiffs' experts can consider these documents for their expert opinions, and that Uber will not object to the admission of these documents at trial on the ground that they were not put into evidence through a fact witness or 30(b)(6)

1 witness. Notwithstanding this Stipulation, Uber reserves all rights to object to the use of these
 2 documents at trial on all *other* grounds including but not limited to grounds of relevance and
 3 prejudice.

5 **DOCUMENTS SUBJECT TO THIS STIPULATION:**

<u>Document Number</u>	<u>Bates Number</u>
1	UBER_JCCP_MDL_001534042
2	UBER_JCCP_MDL_002331333
3	UBER_JCCP_MDL_001534664
4	UBER_JCCP_MDL_005052169
5	UBER_JCCP_MDL_001144266
6	UBER_JCCP_MDL_002063303
7	UBER_JCCP_MDL_002315575
8	UBER_JCCP_MDL_005613067
9	UBER_JCCP_MDL_002315434
10	UBER_JCCP_MDL_002315507
11	UBER_JCCP_MDL_001641347
12	UBER_JCCP_MDL_002394360
13	UBER_JCCP_MDL_003732126
14	UBER_JCCP_MDL_005020883
15	UBER_JCCP_MDL_003768669
16	UBER_JCCP_MDL_002416773
17	UBER_JCCP_MDL_002252092
18	UBER_JCCP_MDL_005534201

1
2
3 **IT IS SO STIPULATED.**
4

5 DATED: December 13, 2025

Respectfully submitted,

6 By: /s/ Rachel Abrams
7 RACHEL B. ABRAMS (Cal Bar No. 209316)
8 ADAM B. WOLF (Cal Bar No. 215914)
9 SARA B. CRAIG (Cal Bar No. 301290)
10 PEIFFER WOLF CARR KANE CONWAY
11 & WISE, LLP
12 555 Montgomery Street, Suite 820
San Francisco, CA 94111
Telephone: 415.766.3544
Facsimile: 415.840.9435
Email: rabrams@peifferwolf.com
awolf@peifferwolf.com
scraig@peifferwolf.com

13 ROOPAL P. LUHANA (*Pro Hac Vice*)
14 CHAFFIN LUHANA LLP
15 600 Third Avenue, Fl. 12
New York, NY 10016
Telephone: (888) 480-1123
Email: luhana@chaffinluhana.com

16 SARAH R. LONDON (SBN 267083)
17 ANDREW R. KAUFMAN (*Pro Hac Vice*)
18 GIRARD SHARP LLP
19 601 California St., Suite 1400
San Francisco, CA 94108
Telephone: (415) 981-4800
Email: slondon@girardsharp.com
akaufman@girardsharp.com

20 *Co-Lead Counsel for Plaintiffs*

21 Dated: December 13, 2025

22 KIRKLAND & ELLIS LLP

23 /s/ Laura Vartain
24 Jessica Davidson (*Admitted Pro Hac Vice*)
jessica.davidson@kirkland.com
601 Lexington Avenue New York, NY 10022
Telephone: (212) 446-4800

1
2 Allison M. Brown (*Admitted Pro Hac Vice*)
3 alli.brown@kirkland.com
4 2005 Market Street, Suite 1000
5 Philadelphia, PA 19103
6 Telephone: (215) 268-5000

7
8 Laura Vartain (SBN 258485)
9 laura.vartain@kirkland.com
10 555 California Street
11 San Francisco, CA 94104
12 Telephone: (415) 439-1400

13
14 *Attorneys for Defendants*
15 UBER TECHNOLOGIES, INC.,
16 RASIER, LLC, and RASIER-CA, LLC
17
18
19
20
21
22
23
24
25
26
27
28

ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's consent and have authorized the filing.

Dated: December 13, 2025

/s/ Alexandra Walsh

Alexandra Walsh

1
2 **[PROPOSED] ORDER**
3
4

5 **IT IS SO ORDERED.**
6
7

8 Dated: _____
9
10

11 United States District Judge
12
13

14 Honorable Charles R. Breyer
15
16

17
18
19
20
21
22
23
24
25
26
27
28